

REMARKS

Claims 1-23 remain pending in the application. Reconsideration is respectfully requested in light of the following remarks.

Section 103(a) Rejections:

The Office Action rejected claims 1-5, 8-11, 12, 15-18 and 21-23 under 35 U.S.C. § 103(a) as being unpatentable over Ng (U.S. Patent 6,411,956) in view of Felt et al. (U.S. Patent 7,080,119) (hereinafter “Felt”), and claims 6, 7, 13, 14, 19 and 20 as being unpatentable over Ng in view of Felt and Yousefi’zadeh (U.S. Publication 2004/0030739). Applicant respectfully traverses these rejections for at least the following reasons.

In regard to claim 1, Ng in view of Felt does not teach or suggest *an application server that comprises: an application configured to initiate requests for connections with a plurality of distinct data resources; a plurality of data sources configured to provide connections with the plurality of distinct data resources; and wherein the application server is configured to associate an identity with each of the plurality of data sources and to use the identity to determine whether one of the plurality of data sources provides connections to the same data resource as another of the plurality of data sources, wherein each identity is unique to one of the plurality of distinct data resources, and wherein multiple ones of the data sources have the same identity.* Ng is directed to the problem of allowing all components working on the same transaction to request separate connections to a database even though the JDBC driver for the database requires that each connection with the database represents a separate transaction. *See* Ng, col. 3, lines 19-34. Ng solves this problem by using multiple virtual connections but only one physical connection with the database for each transaction. *See* Ng, col. 4, lines 1-41. The situation in Ng is described in regard to connections to a single database, as opposed to a plurality of distinct data resources as recited in Applicants’ claim 1. Also, Ng does not describe a plurality of data sources configured to provide connections with the

plurality of distinct data resources. **Ng describes only a single source for connections.** Felt's disclosure is directed to allowing a lightweight client (like a client running on a single-user, unmanaged desktop PC [see col. 7, lines 55-66]) to reliably participate in transaction processing. It allows such clients in a transaction processing system to delegate the commit phase of a transaction to another entity, such as a server [see col. 8, lines 6-18]. Responsibility for transaction coordination is delegated to a transaction manager on the server. The Examiner refers to these aspects of Felt's disclosure, but makes no attempt to explain how they relate to the limitations recited in Applicants' claim 1. Felt recites a plurality of *servers* accessible to the client, but nowhere does Felt teach one or more backend systems comprising a plurality of distinct data resources as recited in Applicants' claim 1. Nor does Felt pertain to an application server comprising a plurality of data sources configured to provide connections with the plurality of distinct data resources. Since neither reference teaches these limitations of Applicants' claim 1, the combination of Ng and Felt also fails to teach these limitations of Applicants' claim 1.

Further in regard to claim 1, Ng in view Felt does not teach or suggest that *the application server is configured to associate an identity with each of the plurality of data sources and to use the identity to determine whether one of the plurality of data sources provides connections to the same data resource as another of the plurality of data sources, wherein each identity is unique to one of the plurality of distinct data resources, and wherein multiple ones of the data sources have the same identity*. On p. 3 of the Final Action the Examiner admits that Ng does not disclose "the use of distinct resources and use of an identifier to delegate the task to a distinct data sources." The Examiner appears to rely on Felt in this regard. However, claim 1 does not recite "the use of distinct resources and use of an identifier to delegate the task to a distinct data sources." Instead, claim 1 recites that "the application server is configured to associate an identity with each of the plurality of data sources and to use the identity to determine whether one of the plurality of data sources provides connections to the same data resource as another of the plurality of data sources, wherein each identity is unique to one of the plurality of distinct data resources, and wherein multiple ones of the data sources have the same

identity.” (emphasis added). **The Examiner has completely ignored the actual wording of the claim.** The Examiner states “Felt teaches the delegation of a commit server and participating server from a plurality of servers to fulfill the request of the client request in a JDBC network environment (see selecting a commit server and participating server on column 8 line 60 to column 9 line14).” Final Action, p. 3. These teachings of Felt have **absolutely nothing to do with** an application server associating an identity with each of the plurality of data sources of the application server, and using the identity to determine whether one of the plurality of data sources provides connections to the same data resource as another of the plurality of data sources, wherein each identity is unique to one of the plurality of distinct data resources, and wherein multiple ones of the data sources have the same identity. Felt’s disclosure is directed to allowing a lightweight client (like a client running on a single-user, unmanaged desktop PC [see col. 7, lines 55-66]) to reliably participate in transaction processing. It allows such clients in a transaction processing system to delegate the commit phase of a transaction to another entity, such as a server [see col. 8, lines 6-18]. Responsibility for transaction coordination is delegated to a transaction manager on the server. The Examiner refers to these aspects of Felt’s disclosure, but makes no attempt to explain how they relate to the limitations recited in Applicants’ claim 1. Felt’s disclosure pertains to clients and servers and transactions between them. Felt does not associate an identity with each of the plurality of data sources and use the identity to determine whether one of the plurality of data sources provides connections to the same data resource as another of the plurality of data sources, wherein each identity is unique to one of the plurality of distinct data resources, and wherein multiple ones of the data sources have the same identity, as recited in claim 1. In fact, neither Felt nor Ng teaches this aspect of Applicants’ claim 1. Therefore, whether taken individually or in combination, Ng and Felt do not teach the limitations of Applicants’ claim 1.

Further in regard to claim 1, the Examiner did not state a proper reason to combine the teachings of the references. The Examiner asserts that it would have been obvious to combine the teachings of Ng with the teachings of Felt “to incorporate distinct data resources to fulfill client application requests.” But Felt and Ng do not teach distinct

data resources contained in one or more backend systems, as recited in claim 1. Moreover, Applicants' claim 1 recites associating an identity with each of the plurality of data sources and using the identity to determine whether one of the plurality of data sources provides connections to the same data resource as another of the plurality of data sources, which is taught neither by Ng nor by Felt. The Examiner asserts that the motivation for combining the cited references is "to select the best suitable distinct data resources to perform the requested task." But neither Ng nor Felt teaches selecting "the best suitable distinct data resources to perform the requested task." In fact, it is unclear what the Examiner means by "the best suitable data resources to perform the requested task." Neither reference mentions a "requested task," and, in contrast, Applicants' claim 1 recites an application requesting a **connection** with several distinct data resources, not a requested task performed by distinct data resources. Thus, the Examiner's reasoning is not commensurate with the teachings of the references, nor with Applicants' claim. Furthermore, even if combined, Ng and Felt would not teach the limitations of Applicants' claim 1. Accordingly, the Examiner has failed to establish a *prima facie* case of obviousness.

In regard to claim 12, Ng in view of Felt does not teach or suggest ascertaining an identity of a data source associated with the request, wherein the data source is configured to provide the connection to one of a plurality of distinct data resources, and wherein said identity is unique to said one of said plurality of distinct data resources; and comparing said identity with respective identities of multiple data sources with existing connections, wherein the identity of each of the multiple data sources is unique to a specific one of said plurality of distinct data resources. **Note that the limitations of claim 12 differ from those of claim 1.** The Examiner has not addressed the differences between claim 1 and claim 12. Therefore, no *prima facie* rejection has been stated for claim 12.

Furthermore, as discussed above, the situation in Ng is described in regard to connections to a single database, as opposed to a plurality of distinct data resources. Also, Ng does not describe a plurality of data sources configured to provide connections

with the plurality of distinct data resources. Ng describes only a single source for connections. Moreover, the table 60 in Ng simply shows which single physical connection is associated with which transaction. The only identifier in Ng is a global transaction identifier which identifies distinct transactions, not distinct data resources. The transaction identifier and table 60 in Ng have absolutely nothing to do with ascertaining an identity of a data source associated with the request, wherein the data source is configured to provide the connection to one of a plurality of distinct data resources, and wherein said identity is unique to said one of said plurality of distinct data resources; and comparing said identity with respective identities of multiple data sources with existing connections, wherein the identity of each of the multiple data sources is unique to a specific one of said plurality of distinct data resources. Moreover, the teachings of Felt have absolutely nothing to do with ascertaining an identity of a data source where the identity is unique to the one of said plurality of distinct data resources for which the data source provides a connection; and comparing said identity with respective identities of multiple data sources with existing connections, wherein the identity of each of the multiple data sources is unique to a specific one of said plurality of distinct data resources. Thus, the combination of Ng and Felt clearly does not teach or suggest Applicants' invention as recited in claim 12.

Similar arguments apply in regard to independent claims 17, 18 and 23. Moreover, in regard to claims 17 and 23, **the Examiner has never addressed the limitations of:** attempting to identify a data source that is already participating in the transaction whose identity matches the identity of the data source associated with the request, wherein said attempting comprises comparing the ascertained identity to identities for a plurality of data sources, wherein each of the plurality of data sources is configured to provide a connection with one of a plurality of distinct data resources, and wherein each identity is unique to one of the plurality of distinct data resources; sharing an existing connection associated with the identity if a data source with a matching identity is found; and providing a new connection if no data source with a matching identity is found. **Therefore, no *prima facie* rejection has been stated for these claims.**

Applicants also assert that numerous ones of the dependent claims recite further distinctions over the cited art. However, since the rejection has been shown to be unsupported for the independent claims, a further discussion of the dependent claims is not necessary at this time.

CONCLUSION

Applicants submit the application is in condition for allowance, and notice to that effect is respectfully requested.

If any fees are due, the Commissioner is authorized to charge said fees to Meyertons, Hood, Kivlin, Kowert, & Goetzel, P.C. Deposit Account No. 501505/5681-14900/RCK.

Respectfully submitted,

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